

MICHAEL R. BORER

WL7CKB

P.O.BOX 221545

ANCHORAGE, ALASKA 99522

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BEFORE THE

FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D.C. 20554

In the matter of	}	WT Docket No.98-143
1998 Biennial Regulatory Review	}	RM-9148
Amendment of Part 97 of the	}	RM-9150
Commission's Amateur Service Rules	}	RM -9196

COMMENTS OF

Michael R. Borer, P.O.Box 221545, Anchorage, Alaska, 99522
on this 5th day of November, 1998, in the matter of
Docket No. 98-143.

I file these comments on this 5th day of November, 1998. My qualifications and reasons for filing are as follows: I am a licensed Amateur Radio Operator, licensed as WL7CKB, Technician Class, since January, 1995. I am a co-District Emergency Coordinator for the Amateur Radio Emergency Service (ARES) for the Anchorage, Alaska area, the Vice-President for the AREA Planning Committee for Anchorage and a volunteer for the American Red Cross on their Disaster Assessment Team (DAT).

To begin with, I was quite pleased to see the F.C.C. make an effort to modify Part 97 Rules, in a positive fashion, so as to bring the Amateur Radio Service into the 21st. Century. I believe that the F.C.C. is on the right track with these proposals, but in most cases they did not go quite far enough.

To be specific, I feel that the F.C.C. proposal to limit the number of license classes to four(4), namely Technician, General, Advanced and Amateur Extra Class is right on. I feel that there was too much redundancy in the Technician Plus and Novice classes and that eliminating them will in no way impact the Service negatively. I do feel that any current Tech Plus or Novice licensee should take the General Class theory exam before being given the General Class privileges.

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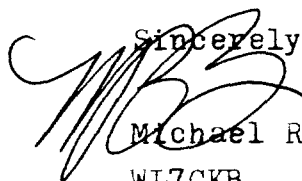
In the matter of the Morse Code Speed Requirement, I don't feel that the Commission has gone far enough. The International Telegraphy Union (ITU) only requires "A knowledge of Code" for entrance to the High Frequency Bands, and the Commission itself recognizes, on the back of Form 610, "Notice to Physican", that a 5 word per minute (wpm) proficiency meets these requirements. Since there are no other services currently using Morse Code as a means of communication, there is no longer a good reason to have a ready supply of trained Morse Code operators, capable of high speed communications, available. Also, with all of the controversy over the proliferation of apparent fraudulent uses of the Disability Waiver, by reducing the code speed to 5wpm for access to all H.F. License classes, this would eliminate this controversy completely. I do feel that should the code requirement be reduced, that at each Upgrade Exam, that the applicant should have to pass the 5wpm portion again.

I realize that many view the lowering of the code requirement would cheapen the value of the Amateur Service by allowing a veritable flood of new operators to the bands, but I believe that if the same or greater emphasis were placed on electronic theory, operating procedures and practices and an understanding of all of the other modes of communication available to today's Amateur Operator, that we would have a much stronger and better prepared cadre of volunteer radio operators to call on in time of emergency and natural disaster.

One further item that I disagree with is the case of expired licenses. I do not feel that anyone should have a "lifetime" credit for any elements that you have previously completed, unless you have kept your license current. The only exceptions would be if you renew your license within the grace period currently allowed by F.C.C. Part 97 rules, which I believe is a maximum of one year.

In conclusion, I would like to congratulate the Commission for it's valiant effort to modernize the Amateur Radio Service, and I hope that my few comments and suggestions might help you to draft a new and comprehensive set of proposals in the near future.

Sincerely

 WL7CKB

Michael R. Borer

WL7CKB

P.O.Box 221545

Anchorage, Alaska 99522

November 5, 1998